

EXHIBIT 7

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849
Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978
Estate of John P. O'Neill, Sr., et al. v. Al Baraka., et al., No. 04 Civ. 1923
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al., No. 04 Civ. 7065
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279

**PLAINTIFFS' THIRD SET OF SUPPLEMENTAL REQUESTS FOR
PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANT
INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**

THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES
March 30, 2012

**PLAINTIFFS' THIRD SET OF SUPPLEMENTAL REQUESTS FOR
PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANT
INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**

Plaintiffs in *Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al.*, Case No. 02 Civ. 6977, *Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03 Civ. 9849, *Federal Insurance Co., et al. v. al Qaida, et al.*, Case No. 03 Civ. 6978, *Estate of John P. O'Neill, Sr., et al. v. Al Baraka., et al.*, Case No. 04 Civ. 1923, *Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04 Civ. 5970, *Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al.*, Case No. 04 Civ. 7065, and *Euro Brokers Inc., et al., v. Al Baraka, et al.*, Case No. 04 Civ. 7279, propound and serve on the International Islamic Relief Organization (hereinafter "Defendant" or "IIRO"), the following Third Set of Supplemental Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The "Instructions" and "Definitions" set forth in the Plaintiffs' First and Second Set of Requests for Production of Documents directed to the International Islamic Relief Organization are incorporated herein by reference, except the following definition shall also apply:

1. The terms "IIRO," "Defendant," "You," and "Your" shall refer to the International Islamic Relief Organization and any branch office, subsidiary, affiliate, officer, director, trustee, employee, attorney, consultant, accountant, agent, alter ego, volunteer, or representative acting on the International Islamic Relief Organization's behalf.

**PLAINTIFFS' THIRD SET OF SUPPLEMENTAL REQUESTS FOR
PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANT
INTERNATIONAL ISLAMIC RELIEF ORGANIZATION**

1. Please provide any and all documents governing, describing, detailing, or otherwise relating to any relationship between the IIRO and the Third World Relief Agency ("TWRA").

ANSWER:

2. Please provide any and all documents relating to any office space shared between the IIRO and the TWRA, including without limitation, the office located at Prinz-Eugen Street, 36/4/2, Vienna, Austria.

ANSWER:

3. Please provide any and all documents the IIRO sent to and/or received from the TWRA, including without limitation, all documents relating to the transfer of funds between the IIRO and the TWRA.

ANSWER:

4. Please provide any and all documents relating to all accounts in any banking or financial institution the IIRO currently holds, or has held, jointly with or on behalf of the TWRA.

ANSWER:

5. Please provide any and all documents relating to the raid on IIRO's branch office in Vienna, Austria, conducted by authorities of the Austrian government on or about September 5, 1995, or any investigation related to that raid, including without limitation, copies of all documents and things which were seized by authorities between 1995 and the present, copies of any communications between the IIRO and any governmental agency concerning the raid and/or any related investigation, any internal IIRO records concerning the raid and/or any related investigation, and any documents concerning any actions undertaken by the IIRO or Saudi government in response to the raid and/or any related investigation.

ANSWER:

6. Please provide any and all documents governing, describing, detailing, or otherwise relating to the relationships between the IIRO and Dr. El Fatih Hassanein and Sukarno Ali Hassanein (collectively "Hassanein Brothers"), including without limitation, all documents relating to all positions the Hassanein Brothers have held or hold within the IIRO. Responsive documentation shall include, but are not limited to, copies of their personnel files, resumes, curriculum vitae, biographies, abstracts, media reports, digests, publications, summaries, employment contracts, and/or outlines.

ANSWER:

7. Please provide any and all documents relating to the Hassanein Brothers' roles in the organization, funding, oversight, supervision, management, and/or control over the IIRO's and/or IIRO-Vienna branch offices' operations (or any other IIRO branch office), including

without limitation, selection of committee/board members or other officers, internal and external auditing or due diligence, budgeting, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, distribution of financial and non-monetary support from the IIRO and/or the IIRO-Vienna branch offices to charitable designees, and reconciliation of receipts, payments, and vouchers for any payments or distributions.

ANSWER:

8. Please provide any and all documents relating to the Hassanein Brothers' supervision, management, control of, or distribution of the IIRO's and/or IIRO-Vienna branch offices' funds (or any other IIRO branch office), including without limitation, all documents relating to their duties and responsibilities to determine and/or make recommendations as to which charities, humanitarian organizations, individuals, or entities should receive financial and/or non-monetary support from the IIRO and/or the IIRO-Vienna branch offices, and the purpose for such disbursements.

ANSWER:

9. Please provide any and all documents relating to the transfer of IIRO funds authorized by either or both of the Hassanein Brothers and/or the IIRO Vienna branch offices (and/or any IIRO official, employee, representative, or agent working on behalf of the Hassanein Brothers or the IIRO-Vienna branch offices).

ANSWER:

10. Please provide any and all documents relating to all bank accounts established or held in the name of, on behalf of and/or for the benefit of the IIRO-Vienna branch offices, including without limitation, all IIRO accounts over which either or both of the Hassanein Brothers had signatory authority. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among the IIRO, the Hassanein Brothers, and the bank, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

11. Please provide any and all documents detailing all contributions received and disbursements made by the IIRO-Vienna branch offices, including any outward payment orders, payment or expense vouchers and receipts, letters authorizing payments, cash collection and disbursement summaries, expenditure journals, receipt and disbursement reconciliation reports or summaries, and any audit, review, or analysis of receipts and disbursements.

ANSWER:

12. Please provide any and all documents relating to all bank accounts established or held in the name of, on behalf of and/or for the benefit of the IIRO branch offices located in: (1) Zagreb, Croatia; (2) Split, Croatia; (3) Zenica, Bosnia-Herzegovina; (4) Tuzla, Bosnia-Herzegovina; (5) Konjic, Bosnia-Herzegovina; (6) Ljubliana, Slovenia; and (7) Skopje, Macedonia. Responsive documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between the IIRO and the bank, documents detailing the establishment of and/or closing of the account(s), suspicious activity and/or transaction reports, account numbers, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

13. Please provide any and all annual, semi-annual, and other periodic reports submitted by the IIRO branch offices identified in Request No. 12 to IIRO headquarters in Saudi Arabia, such as annual reports, balance sheets, financial statements, bank account summaries, audits, expenditure reports or summaries, receipt and disbursement reconciliation reports or summaries, and cash collection and disbursement reports or summaries.

ANSWER:

14. Please provide any and all reports submitted by the IIRO branch offices identified in Request No. 12 to IIRO headquarters in Saudi Arabia concerning their operations and finances.

ANSWER:

15. Please provide any and all documents detailing all contributions received and disbursements made by the IIRO branch offices identified in Request No. 12, including any outward payment orders, payment or expense vouchers and receipts, letters authorizing payments, cash collection and disbursement summaries, expenditure journals, receipt and disbursement reconciliation reports or summaries, and any audit, review, or analysis of receipts and disbursements.

ANSWER:

16. Please provide any and all documents relating to any banking accounts maintained by any IIRO branch office which were not specifically authorized by IIRO headquarters in Saudi Arabia.

ANSWER:

17. Please provide any and all lists or documents reflecting the identifies of individuals who were affiliated, as employees, volunteers, or otherwise, with the IIRO's

operations in Afghanistan, Bosnia, Chechnya, Croatia, Indonesia, Kosovo, Macedonia, Pakistan, the Philippines, Slovenia, or elsewhere between 1992 and 2001.

ANSWER:

18. Please provide any and all documents relating to the role of the IIRO and/or the IIRO-Zagreb branch office in establishing the “coordination council” which is identified in IIRO13287-13292 (report sent from Dr. Imad al Din Mohammed, IIRO-Zagreb’s office manager, to Dr. Abd Allah al Abdan, IIRO’s Emergencies Administration Supervisor, discussing the activities of the IIRO-Zagreb office for the time period of May 1, 1992 through November 30, 1992), attached hereto as Exhibit A. Responsive materials shall include, but are not limited to: (i) all documents identifying all individuals comprising the council’s leadership; (ii) all documents identifying the approximately sixty (60) member organizations of the council; (iii) all correspondence, memoranda, reports, or otherwise relating to the activities of the council and its member organizations; (iv) all documents relating to the transfer of funds between and among the IIRO and any of the council’s member organizations; and (v) Zahir Abd al Aziz’s (regional supervisor of the IIRO’s branch offices in Bosnia-Herzegovina, Croatia, and Slovenia) role as chairman of the council.

ANSWER:

19. Please provide any and all documents governing, describing, detailing, or otherwise relating to any relationship between the IIRO and the individuals identified in Attachment A, including without limitation, all documents relating to all positions they held or

hold within the IIRO. Responsive documentation shall include, but are not limited to, copies of their personnel files, resumes, curriculum vitae, biographies, abstracts, media reports, digests, publications, summaries, employment contracts, and/or outlines.

ANSWER:

20. Please provide any and all documents the IIRO sent to, and/or received from, the individuals identified in Attachment A, including without limitation, all documents relating to the transfer of funds between the IIRO and those individuals.

ANSWER:

21. Please provide any and all documents relating to any accounts in any banking or financial institution the IIRO currently holds, or has held, jointly with or on behalf of the individuals identified in Attachment A, and/or any IIRO accounts over which those individuals hold or have held signatory authority.

ANSWER:

22. From the period beginning January 1, 1992 through December 31, 2004, please provide any and all documents identifying any officers for each IIRO office, both within the Kingdom and abroad. For purposes of this request, the term “officer” shall include without limitation any director, executive director, manager, president, vice-president, secretary, and treasurer.

ANSWER:

23. Please provide any and all documents in the possession of any accounting or auditing firm that performed work for the IIRO for the period 1992 through 2004.

ANSWER:

24. Please provide any and all documents in the possession of Ernst & Young, or any member company of Ernst & Young, relating to work performed for, or on behalf of, the IIRO.

ANSWER:

25. For every audit conducted for each IIRO office, both within the Kingdom and abroad, please provide copies of all the underlying financial and accounting data reviewed by the auditors which form the basis for their final reports, including without limitation: (i) all invoices, bills, receipts, and expense vouchers; (ii) all daily, monthly, and annual finance reports and/or summaries (originating from both the Saudi headquarters and the IIRO branch office); (iii) all documentation identifying all money transfers; (iv) all recipients of monetary and non-monetary aid; and (v) bank account records, including without limitation, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

26. For the IIRO-Pakistan branch office audit conducted by Ernst & Young at IIRO026468-026490, titled “Verification of Receipts and Payments,” (hereinafter referred to as “IIRO-Pakistan Audit”), please provide copies of all the underlying financial and accounting data reviewed by Ernst & Young and which form the basis for its final report, including without limitation: (i) all invoices, bills, receipts, and expense vouchers; (ii) all daily, monthly, and annual finance reports and/or summaries (originating from both the Saudi headquarters and the IIRO branch office); (iii) all documentation identifying all money transfers; (iv) all recipients of monetary and non-monetary aid; and (v) bank account records, including without limitation, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

27. Please provide any and all documents identifying the ex-Director General of the IIRO-Pakistan branch, who is referenced in IIRO026472. Responsive documentation shall include, but are not limited to, copies of the ex-Director General’s personnel files, resumes, curriculum vitae, biographies, abstracts, media reports, digests, publications, summaries, employment contracts, and/or outlines.

ANSWER:

28. Please provide any and all documents concerning any investigation of the ex-Director General of the IIRO-Pakistan branch office and/or the operations and finance of the IIRO-Pakistan branch office.

ANSWER:

29. Please provide any and all documents relating to any internal investigations conducted by, and/or any subsequent actions taken by, the IIRO in response to the findings and conclusions of the IIRO-Pakistan Audit. Responsive documents shall include, but are not limited to, all documents the IIRO sent to, and/or received from, the Saudi government and its officials relating to the IIRO-Pakistan audit and final report.

ANSWER:

30. Please provide any and all documents relating to any disciplinary actions taken, or any decision to terminate any relationship with any IIRO subsidiary, affiliate, officer, director, trustee, board member, committee member, manager, agent, employee, volunteer, and/or representative in response to the findings and conclusions of the IIRO-Pakistan Audit.

ANSWER:

31. Please provide any and all documents reflecting any investigation, inquiry, review, analysis, survey, and/or study of the potential misuse or misappropriation of funds by the IIRO-Pakistan branch office, or any employee of that office.

ANSWER:

32. Please provide any and all documents reflecting the ultimate destinations or recipients of any funds allegedly misused or misappropriated by the IIRO-Pakistan branch office, or any employee of that office.

ANSWER:

33. Please provide any and all documents relating to the distribution of the IIRO-Pakistan Audit within the IIRO, including any documents identifying any IIRO personnel who received same.

ANSWER:

34. Please provide any and all documents relating to any meeting concerning the IIRO-Pakistan Audit.

ANSWER:

35. Please provide any and all documents relating to the IIRO-Pakistan Audit.

ANSWER:

36. Please provide any and all documents relating to any investigation, inquiry, review, audit, analysis, survey, and/or study of the potential misuse or misappropriation of funds by any IIRO office throughout the world.

ANSWER:

37. Please provide any and all documents relating to any investigation, inquiry, review, audit, analysis, survey, and/or study conducted for the purpose of verifying that funds distributed by the IIRO to its branch offices were applied for the purposes intended.

ANSWER:

38. Please provide any and all documents relating to any internal investigation, inquiry, review, audit, analysis, survey, and/or study conducted by the IIRO's internal finance and/or auditing departments, for purposes of reconciling disbursements to any IIRO branch office and the distribution and expenditure of funds by that branch office.

ANSWER:

39. Please provide any and all documents relating to any investigation, inquiry, review, audit, analysis, survey, and/or study undertaken by the IIRO or any third party, for purposes of verifying payments by any IIRO branch office, and/or for purposes of determining whether the documents supporting any payments are authentic.

ANSWER:

40. Please provide any and all outward payment orders issued by IIRO's banks in relation to funds transmitted by IIRO offices in Saudi Arabia to any branch office outside of the Kingdom.

ANSWER:

41. Please provide any and all supporting or authorization documents issued by IIRO in Saudi Arabia to its banks in relation to the transfer of funds to branch offices abroad.

ANSWER:

42. Please provide any and all documents relating to any potential falsification of receipts, invoices, or payments by any IIRO branch office.

ANSWER:

43. Please provide any and all documents reflecting any recommendations made to the IIRO by any third party accounting or auditing firm concerning bookkeeping or accounting procedures at the IIRO or any of its branch offices, the prevention of misuse or misappropriation of IIRO funds, the reconciliation of distributions by IIRO and Saudi Arabia and disbursements made by IIRO offices abroad, or any other recommendations precipitated by any audit, review, or analysis conducted by any such auditing or accounting firm.

ANSWER:

44. Please provide any and all documents relating to revenue generated by for-profit enterprises run by the IIRO, including for-profit enterprises run by any of its branch offices, and the use and allocation of funds received from such enterprises.

ANSWER:

45. Please provide any and all documents relating to any investigation, inquiry, review, audit, analysis, survey, and/or study undertaken by the IIRO or any third party in relation to the alleged misappropriation of funds by the IIRO branch office in the United States (Islamic Relief Organization), Suleiman al Ali, Soliman S. Biheiri, BMI Real Estate Development, Inc., and BMI Leasing, Inc. Responsive materials shall include, but are not limited to, documents relating to any internal IIRO meetings and correspondence concerning the alleged misappropriation of funds.

ANSWER:

46. Please provide any and all documents relating to any internal IIRO meetings concerning the alleged misappropriation of funds by the IIRO branch office in the United States (Islamic Relief Organization), Suleiman al Ali, Soliman S. Biheiri, BMI Real Estate Development, Inc., and BMI Leasing, Inc.

ANSWER:

47. Please provide any and all internal IIRO correspondence concerning the alleged misappropriation of funds by the IIRO branch office in the United States (Islamic Relief Organization), Suleiman al Ali, Soliman S. Biheiri, BMI Real Estate Development, Inc., and BMI Leasing, Inc. Responsive documents shall include, but are not limited to, all documents the IIRO sent to, and/or received from, the Saudi government and its officials relating to same.

ANSWER:

48. Please provide any and all documents relating to the sale of the property and building formerly owned by Sanabel al Kheer, Inc., located at 360 S. Washington Street, Falls Church, VA 22046, including without limitation, all documents detailing or describing the disposition of all funds received as a result of the sale.

ANSWER:

49. Please provide any and all documents relating to any grants or loans IIRO-Saudi Arabia made to Sanabel al Kheer, Inc.

ANSWER:

50. Please provide any and all documents describing, detailing, or otherwise relating to the remission of any funds from Sanabel al Kheer, Inc. to IIRO-Saudi Arabia following the sale of the property and building located at 360 S. Washington Street, Falls Church, VA 22046.

ANSWER:

Respectfully submitted,

Dated: March 30, 2012

BY: /s/
THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Plaintiffs' Third Set of Supplemental Requests for Production of Documents Directed to the International Islamic Relief Organization was served via electronic mail and U.S. first-class mail, postage prepaid, this 30th day of March 2012, upon:

Martin F. McMahon, Esq.
Martin F. McMahon & Associates
1150 Connecticut Avenue, N.W.
Suite 900
Washington, D.C. 20036

Alan R. Kabat, Esq.
Bernabei & Wachtel, PLLC
1775 T Street, N.W.
Washington, D.C. 20009-7124

(Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)

/s/ _____
J. Scott Tarbutton, Esq.

ATTACHMENT A

Zaher Abdelaziz (a/k/a Zaher Abel Aziz; a/k/a Zaher Abd al Aziz; a/k/a Abu Enes; a/k/a Abu Anas)

Abdul Hadi al Qahtani (a/k/a Abdul Hado al Gahtani)

Selim Ben Mafuz

Djamel Lamrani (a/k/a Abu Musab al Djazairi; a/k/a Jamal Lermani)

Jamal al Jibouri (a/k/a Abu Mahmmoud al Iraqi)

Talaat Fuad Qassem

Hussein Muawad Mohammad Hall

Abu Talal al Qasimi

Saleh Ghassan

Dr. Mohamad al Najifi

Dr. Imad al Din Mohammed

Muaid Abd al Wahad al Butairi

Fouad Abdelgadir Homeida Elagabani

Mohamed Hussein Hassan Zaroug